

Exhibit U



Deposition of:
William Longo , Ph.D.

February 27, 2020

In the Matter of:
**Zimmerman, Linda Vs. Autozone Inc.,
Et Al.**

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Page 191

1 A No.

2 Q Do you know when your deposition in
3 Citizen is resuming? Have you given them a date
4 for that yet?

5 A You know, I may have.

6 Q You just don't recall right now?

7 A No. I'd have to check with my office.
8 But I'm sure that's been set.

9 Q I'm turning my attention to Exhibit 6,
10 which was the -- I'm hoping is the February 4th,
11 2020, slides that you had prepared for the
12 meeting with some of the representatives from the
13 FDA.

14 A Yes.

15 Q Do you have that there?

16 A I do.

17 Q There's a slide -- they're not
18 numbered -- about halfway through. The title of
19 it is MAS LLC HLS Analysis for Chrysotile
20 Asbestos by PLM.

21 A Yes.

22 Q On this particular page, what's being
23 shown on this slide again titled MAS HLS Analysis
24 for Chrysotile Asbestos by PLM, is this the
25 method that was used with respect to the

Page 192

1 chrysotile analysis by PLM on the two bottles
2 that had been submitted by Ms. Zimmerman to her
3 counsel?

4 A Very close. Since February 4th, we've
5 refined it a little. For PLM bulk, we're
6 starting with one gram, and we're using what
7 Reynolds used in his 1974 protocol that he wrote
8 for the Colorado School of Mines.

9 And we are probably going to change
10 that 2.72 which was used for Zimmerman's to 2.65.
11 I believe that's more efficient for chrysotile.
12 And the centrifuge at 5 minutes for 500 RPM and
13 1800 RPM, we found that 10 minutes works better
14 on efficiency of separation, so that's changed.
15 Everything else is the same.

16 Q So I think the first thing you said
17 was something about one gram. Where's the change
18 at least with respect to that particular
19 component in the slide?

20 A See the very first sentence that says,
21 "Stain 200 milligrams of cosmetic talc with
22 Betadine (2 percent iodine)"?

23 Q Yes.

24 A That's been changed to one gram.

25 Q And what was the reasoning for that

Page 219

1 CERTIFICATE

2 STATE OF GEORGIA:

3 COUNTY OF COBB:

4 I hereby certify that the foregoing
5 transcript was taken down, as stated in the
6 caption, and the colloquies, questions and
7 answers were reduced to typewriting under my
8 direction; that the transcript is a true and
9 correct record of the evidence given upon said
10 proceeding.

11 I further certify that I am not a
12 relative or employee or attorney of any party,
13 nor am I financially interested in the outcome of
14 this action.

15 I have no relationship of interest in
16 this matter which would disqualify me from
17 maintaining my obligation of impartiality in
18 compliance with the Code of Professional Ethics.

19 I have no direct contract with any party
20 in this action and my compensation is based
21 solely on the terms of my subcontractor
22 agreement.

23 Nothing in the arrangements made for
24 this proceeding impacts my absolute commitment to
25 serve all parties as an impartial officer of the

Page 220

1 court.

2 This the 2nd day of March, 2020.

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6 Jennifer D. Hamon, CCR B-2287, RPR

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